

Section 1. Registration Information

Source Identification

Facility Name:	Hill Brothers Chemical Co. - Tucson facility
Parent Company #1 Name:	Hill Brothers Chemical Co.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	19-Jun-2009
Postmark Date:	19-Jun-2009
Next Due Date:	19-Jun-2014
Completeness Check Date:	19-Jun-2009
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0006 6849
Other EPA Systems Facility ID:	AZD0053643938

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	56599178
Parent Company #1 DUNS:	56599178
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	3602 East 34th Street
Street 2:	
City:	Tucson
State:	ARIZONA
ZIP:	85713
ZIP4:	
County:	PIMA

Facility Latitude and Longitude

Latitude (decimal):	32.193889
Longitude (decimal):	-110.915833
Lat/Long Method:	Address Matching - House Number
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	10
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Hill Brothers Chemical Co.
Operator Phone:	(714) 998-8800

Mailing Address

Operator Street 1:	1675 North Main Street
Operator Street 2:	
Operator City:	Orange
Operator State:	CALIFORNIA
Operator ZIP:	92867
Operator ZIP4:	3499
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Rick Hill
RMP Title of Person or Position:	Director of Safety and Compliance
RMP E-mail Address:	

Emergency Contact

Emergency Contact Name:	Terry Milligan
Emergency Contact Title:	Operations Manager
Emergency Contact Phone:	(520) 795-9351
Emergency Contact 24-Hour Phone:	(520) 795-9351
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	hbtucson@hillbrothers.com

Other Points of Contact

Facility or Parent Company E-mail Address:	hillchem@hillbrothers.com
Facility Public Contact Phone:	(520) 795-9351
Facility or Parent Company WWW Homepage Address:	www.hillbrothers.com

Local Emergency Planning Committee

LEPC:	Pima County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	6
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External Agency:

Never had one

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Kazarians & Associates, Inc.
Preparer Phone:	(818) 242-0401
Preparer Street 1:	221 East Glenoaks Blvd.
Preparer Street 2:	Suite 101
Preparer City:	Glendale
Preparer State:	CALIFORNIA
Preparer ZIP:	91207
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000007706
Description:	Warehouse
Process Chemical ID:	1000008632
Program Level:	Program Level 3 process
Chemical Name:	Chlorine
CAS Number:	7782-50-5
Quantity (lbs):	35000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000007706
Process NAICS ID:	1000010187
Program Level:	Program Level 3 process
NAICS Code:	42469
NAICS Description:	Other Chemical and Allied Products Merchant Wholesalers

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000006442

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	Yes
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000007077

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown:
Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

Hill Brothers Chemical Company has PSM and Risk Management programs in place to manage the handling of regulated substances. The programs which comply with Federal RMP and PSM requirements, include strict requirements for written operating procedures, personnel training, contractor safety, equipment maintenance, incident investigation, process hazard analysis, management of change and periodic review or audit of program elements. Management of change element addresses proper implementation of system updates to ensure that all changes are reviewed properly by knowledgeable persons, all engineering documents and operating procedures reflect the change, and personnel are trained on the change. The programs also require a pre-startup safety review to ensure that changes are reviewed before revenue operation resumes.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000009289
Chemical Name:	Chlorine
Flammable/Toxic:	Toxic
CAS Number:	7782-50-5

Prevention Program Level 3 ID:	1000008102
NAICS Code:	42469

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	15-Jun-2009
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	19-May-2009
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The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	30-Sep-2009

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes

Corrosion:	Yes
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	
Relief Valves:	
Check Valves:	
Scrubbers:	
Flares:	
Manual Shutoffs:	
Automatic Shutoffs:	
Interlocks:	
Alarms and Procedures:	
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	Cylinder fuse plug

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	Yes
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:
Installation of Process Controls:
Installation of Process Detection Systems:
Installation of Perimeter Monitoring Systems:
Installation of Mitigation Systems:
None Recommended:
None: Yes
Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 12-May-2009

Training

Training Revision Date (The date of the most recent review or revision of training programs): 29-Apr-2005

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training:

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests:
Demonstration: Yes
Observation: Yes
Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 01-Jan-2009

Equipment Inspection Date (The date of the most recent equipment inspection or test): 16-Jun-2009

Equipment Tested (Equipment most recently inspected or tested): cylinders, container and valve covers

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 17-Aug-2004

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 15-May-2008

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 30-Jul-2009

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 09-May-2002

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 15-Jul-2001

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 07-Jan-2002

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 22-Sep-2003

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 22-Sep-2003

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Tucson Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (520) 791-4512

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Other (Specify):

Executive Summary

RISK MANAGEMENT PLAN - TUCSON FACILITY

EXECUTIVE SUMMARY

Hill Brothers Chemical Company has established a risk management plan (RMP) according to Federal EPA's (40 CFR Part 68) and OSHA Process Safety Management (29 CFR 1910.119) regulations to enhance already existing safety and emergency response programs for the storage and distribution of chlorine cylinders at its Tucson Facility.

Hill Brothers Chemical Company is extremely cautious in the handling of all chemicals and is very diligent about safety of its employees, the communities where its facilities are located, and customers. Hill Brothers Chemical Company staff is well trained and utilizes well maintained equipment to handle chemicals.

Accidental Release Prevention and Emergency Response Policies

Hill Brothers Chemical Company has an emergency response plan in effect to handle potential emergency situations at this facility. This plan was designed to meet the following objectives:

- 1.) To save lives.
- 2.) To minimize and avoid injuries.
- 3.) To protect the environment.
- 4.) To minimize property damage.

Hill Brothers Chemical Company policy is to conduct all operations in a safe and conscientious manner to prevent accidental releases of any hazardous material. Hill Brothers Chemical Company trains its employees at this facility to properly handle and store hazardous materials to minimize the possibility of adversely affecting its worker's health, the workplace, the public, and the environment. Hill Brothers Chemical Company Accidental Release Prevention policy is implemented through the management system contained in its RMP.

Hill Brothers Chemical Company emergency response policy is contained in its current written Hazardous Materials Business Plan. A designated Emergency Coordinator (EC) and an alternate EC initiate emergency notifications and evacuations. All employees are trained in their appropriate role in emergency response and proper procedures for awareness level response. The Tucson Facility has established a highly cooperative relationship with the Tucson Fire Department to ensure a full understanding of normal storage practices and emergency response and evacuation procedures related to regulated substances.

Stationary Source and Regulated Substance

The Hill Brothers Chemical Company, Tucson Facility stores and distributes chlorine 150-pound cylinders and one-ton containers. Covered processes include unloading, loading and storing pre-packaged chemicals for resale to commercial accounts. No manufacturing or repackaging is performed at this facility.

Chlorine stored at the warehouse is contained in metal vessels designed to Department of Transportation standards. Each chlorine container delivered, stored, and distributed at the warehouse has a steel valve protection cap which covers the container valve or valves. These steel protective caps are never removed from the container and the container valves are never opened or operated in any way at the warehouse. All cylinders are inspected upon arrival at the facility to ensure that they meet all applicable safety codes. The containers are stored in a concrete building with a wood roof and a fire sprinkler system for fire protection.

Accidental Release Prevention Program and Chemical-Specific Prevention Steps

Hill Brothers Chemical Company has PSM and Risk Management programs in place to manage handling of regulated substances. The programs which comply with Federal RMP and PSM requirements, include strict requirements for written operating procedures,

personnel training, contractor safety, equipment maintenance, incident investigation, process hazard analysis, management of change and periodic review or audit of program elements. Management of change element addresses proper implementation of system updates to ensure that all changes are reviewed properly by knowledgeable persons, all engineering documents and operating procedures reflect the change, and personnel are trained on the change. The programs also require a pre-startup safety review to ensure that any changes are reviewed before revenue operation resumes.

Five Year Accident History

The five-year accident history (June 2004 to June 2009) for the Hill Brothers Chemical Company, Tucson Facility reveals that there were no reportable accidents during this period.

Planned Changes to Improve Safety

Hill Brothers Chemical Company Tucson Facility is taking additional steps to further safety. Several studies have been conducted recently to examine mitigation measures and additional steps to enhance safety at the Hill Brothers Chemical Company, Tucson Facility. The changes primarily include detailed reviews and updates of formal operating, maintenance, and emergency response procedures to address comments and recommended actions identified through various analyses. All recommended changes from the Process Hazard Analysis and triennial RMP/PSM Audit have been reviewed and implemented.